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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
MODESTO DIVISION

MOTION FOR AN ORDER APPROVING
LOAN MODIFICATION AGREEMENT WITH NATIONSTAR

Debtors, Luis Delgado and Sonia Delgado, through their attorney Christie S. Lee, move the court herein to approve a loan modification agreement with Nationstar filed on December 9, 2016. This motion is based on the Notice of Motion and Joint Declaration of Debtors indicating that Nationstar wants such court approval to modify the loan.

The owner of the real property subject to loan modification is JOSE M. TOVAR, aka, Jose Tovar-Villa (“Jose”), the father of Sonia Delgado. Jose is the one who lives in the property and pays the mortgage, property taxes, and any expenses necessary to maintain the property. Debtors are only cosigners of the loan. Debtors have not paid and will not pay any loan

1 payments toward the Property. Therefore, the loan modification has no effect on the current
2 plan payment.

3 In order for Jose to keep the Property, loan modification is necessary. Although
4 Nationstar approved the loan modification, Nationstar requires Debtors to get the Court
5 approval of this modification agreement to complete the process.
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7 WHEREFORE, the Debtors now request the Court to approve the loan modification
8 agreement with Nationstar.
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10 Executed this 9th day of December, 2016 at Modesto, CA.
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15 /s/ Christie S. Lee.
16 Christie S. Lee, Esq.
17 Attorney for Debtors
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